

EG&G ROCKY FLATS



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EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

January 9, 1990

90-RF-0076

David P. Simonson Manager DOE, RFO

PLAN FOR PLANT-WIDE CONTROL OF SURFACE WATER DISCHARGES

Ref: 1785-RF-89 dated 12/14/89 (Attached)

The requested formal procedure and implementation plan for plant-wide control of surface water discharges cannot be submitted by the requested date of January 12, 1990. That date would not allow time to properly develop the required procedure or complete proper review prior to implementation. We will implement the following interim plan prior to January 11, 1990, for plant wide control of surface water discharge prior to completion of a detailed procedure.

If water is encountered, during any construction activities involving excavation, the EG&G Construction Management and Inspection coordinator is to contact the EG&G Clean Water Act Division, (formerly part of the Environmental Management Group) for assistance with determination of acceptable disposal methods.

If the water is encountered in an area of suspected contamination, either chemical or radiological, the water is to be impounded and transferred to Liquid Waste Processing, Building 374. The water will be considered contaminated prior to laboratory analysis confirmation due to the lengthy processing times some analyses require. Solid Waste Management Units (SWMUs) and excavation in close proximity to underground process waste lines are considered potentially contaminated. In no case are these waters to be pumped to the storm or sanitary drain systems.

Waters encountered during excavations in areas with no history of contamination and remote from SWMUs require two field analyses and a sample collected for alpha and beta analyses. The field tests for nitrate and pH will be necessary prior to discharge to a storm drain. If the alpha and beta results are acceptable the pumping of these waters may continue until there is a precipitation event when the pumping must stop until the water is resampled. Written orders will be issued by January 10, 1990, to effect the actions above.

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We also will initiate a draft procedure and solicit comments from all affected groups. There are many organizations that must be involved in implementing this important policy. These groups will include Environmental Restoration, RCRA, Construction

APPROVALS:

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Management and Inspection, Laboratories, Liquid Waste Management, HS&E Area Engineers, Plant Services and possibly others. The draft procedure will be prepared as soon as practical with assistance from contract personnel. We will complete a draft plan to be submitted to the groups for comments by February 12, 1990. This draft will be provided to DOE for concurrent review at that time.

If you have any questions or require further information, please do not hesitate to call Farrel D. Hobbs, ext. 7006 or Ralph W. Hawes, ext. 2582.

John M. Kersh, Associate General Manager Environmental Restoration and Waste Management EG&G Rocky Flats

Original and 1 cc: D. P. Simonson

Attachment: As Stated

RWH/Imc